

CR 25-197 JWBSGE

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2251(a)

v.

18 U.S.C. § 2251(e)

18 U.S.C. § 2422(b)

ROBERT JAMES LEVI,

18 U.S.C. § 2260A

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT ONE

(Production and Attempted Production of Child Pornography)

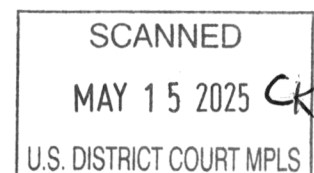
From at least February 24, 2022, to February 10, 2025 , in the State and
District of Minnesota, the defendant,

ROBERT JAMES LEVI,

having previously been convicted of the following crime relating to the sexual
exploitation of children:

Offense	Place of Conviction	Date of Conviction (On or About)
Criminal Sexual Conduct in the Second Degree	Stearns County, MN	February 29, 2024

did employ and use and attempt to employ and use a known minor to engage
in sexually explicit conduct for the purpose of producing a visual depiction of
such conduct which visual depiction was produced and attempted to be



produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

(Coercion and Enticement of a Minor)

From at least February 24, 2022 to February 10, 2025, in the State and District of Minnesota, the defendant,

ROBERT JAMES LEVI,

knowingly used the mail and any facility and means of interstate and foreign commerce to persuade, induce, entice, and coerce any individual who has not attained the age of 18 years to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code, Section 2422(b).

COUNT THREE

(Offense by a Registered Sex Offender)

From at least March 14, 2024, to February 10, 2025, in the State and District of Minnesota, the defendant,

ROBERT JAMES LEVI,

an individual who has a prior conviction for Criminal Sexual Conduct in the Second Degree, and who is required by federal and other law to register as a sex offender, did commit a felony offense involving a minor under Title 18,

United States Code, Section 2422, as charged in Count One of this indictment, in violation of Title 18, United States Code, Section 2260A.

FORFEITURE ALLEGATIONS

Upon conviction of any of Counts 1-3 of the Indictment, the defendant,

ROBERT JAMES LEVI,

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253(a):

1. any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18, United States Code;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
3. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

The property subject to forfeiture upon conviction of Counts 1-3 includes, but is not limited to, a Samsung, A14 cellular phone, bearing serial number

R92W31085TT, recovered by law enforcement during the search of Levi's person.

Upon conviction of any of Counts 2-3 of the Indictment, the defendant shall forfeit, pursuant to Title 18, United States Code, Section 2428(a), any property, real or personal, used or intended to be used to commit or to facilitate the commission of Counts 1 and 2, and any property, real or personal, constituting or derived from any proceeds that the defendant obtained, directly or indirectly, as a result of such violation, including, but not limited to, a Samsung, A140 cellular phone, bearing serial number R92W31085TT, recovered by law enforcement during a search of Levi's person.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL

ACTING UNITED STATES ATTORNEY

FOREPERSON